CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER: 74582

CHEMISTRY REVIEW(S)

Chemistry Closed

Office of Generic Drugs

Chemistry, Manufacturing and Controls Review

- 1. CHEMIST'S REVIEW NO.: No. 4
- 2. ANDA #: 74-582
- 3. NAME AND ADDRESS OF APPLICANT:

Attention: Herbert G. Luther, Ph.D. Barr Laboratories

2 Quaker Road, PO Box D2900, Pomona, NY 10970-0519

- 4. LEGAL BASIS FOR ANDA SUBMISSION: See CR #1 for details.
- 5. SUPPLEMENTS(s): N/A 6. PROPRIETARY NAME: N/A
- 7. NONPROPRIETARY NAME: Danazol Capsules USP, 200 mg
- 8. SUPPLEMENT(S) PROVIDE(S) FOR: N/A
- 9. AMENDMENTS AND OTHER DATES:

Barr
12/05/94 Submission of ANDA (received at OGD on 12/06/94)
01/24/95 Response to refuse to file letter of 12/23/94
07/26/95 Response to NA (MINOR) letter dated 06/06/95
10/04/95 Response to NA (MINOR) letter dated 08/24/95
02/20/96* MAJOR amendment and bioequivalence information

03/06/96* Bioequivalence information

FDA
02/03/95 Acknowledgement letter (acceptable on 01/25/95)
06/06/95 NA (MINOR) letter (from CR #1 by S. Liu)
08/24/95 NA (MINOR) letter (from CR #2 by S. Liu)
10/30/95 Bio deficiency letter (from bio review of 10/16/95)
11/20/95 NA (MAJOR) letter (from CR #3 Chem Closed action)

- 10. PHARMACOLOGICAL CATEGORY:
 Pituitary gonadotropin suppressant

 RX

 RX
- 12. RELATED IND/NDA/DMF(s): See CR #1.
- 13. **DOSAGE FORM:** Capsules 14. **POTENCY:** 200 mg
- 15. CHEMICAL NAME AND STRUCTURE: See CR #1.
- 16. RECORDS AND REPORTS: N/A
- 17. COMMENTS:

Last chemistry review (CR #3) recommended a chemistry closed action. But a NA (MAJOR) letter was issued (dated 11/20/95) from Chemistry Division I because of the unacceptable bioequivalency status (Bio letter dated 10/30/95).

Barr's responses (dated 02/20/96 and 03/06/96) to the bio deficiency letter of 10/30/95 addressed several CMC issues raised by the bio reviewer. Although Barr's cover letter of 02/20/96 did not refer to the date of the NA letter issued from Chemistry Division I, the submission of 02/20/95 amendment should be considered as a response to the NA letter of 11/20/95. Therefore, the 02/20/95 submission was used to reopen the clock as a major amendment on the chemist's queue.

This chemistry review reviewed the CMC issues raised by the bio reviewer in order to check if there are major CMC amendment since the last chemistry review. The reviewer confirms that Barr did not manufacture a new batch nor did they change their analytical methodology. There are no USP updates for the drug substance and drug product since last chemistry review (CR #3).

Barr's 02/20/96 and 03/06/96 amendments are to be reviewed by OGD's bio reviewer.

18. CONCLUSIONS AND RECOMMENDATIONS:

This ANDA remained chemistry closed. Since EER and labeling are also satisfactory, the approvability of the ANDA is dependent upon the bio review.

19. REVIEWER: Shing H. Liu, Ph.D.

DATE COMPLETED:

07/02/96

cc: ANDA #74-582 DUP File Division File Field Copy

Endorsements:

HFD-625/SHLiu/07/02/96 Ahayton Lin 07/09/96

HFD-625/MSmela/

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Bio acceptable and to 1/23/91